

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LISA MENNINGER,

Plaintiff,

v.

PPD DEVELOPMENT, L.P.,

Defendant.

Civil Action No: 1:19-CV-11441-LTS

**PLAINTIFF'S PROPOSED VERDICT FORM**

**Part A**

1. Has Plaintiff Lisa Menninger proved to you by a preponderance of the evidence that Defendant PPD Development, L.P. unlawfully discriminated against her?

YES \_\_\_\_\_ NO \_\_\_\_\_

*Proceed to Question 2.*

2. Has Plaintiff Lisa Menninger proved to you by a preponderance of the evidence that Defendant PPD Development, L.P. unlawfully retaliated her?

YES \_\_\_\_\_ NO \_\_\_\_\_

*If you answered Yes to Question 1, Question 2, or both, proceed to Part B. If you answered No to both Questions, proceed to Part D.*

**Part B**

3. What amount do you award Plaintiff Lisa Menninger in past compensatory damages for the time period up to today's date?

\$\_\_\_\_\_ (amount expressed in numbers)

\_\_\_\_\_ (amount expressed in words)

4. What amount do you award Plaintiff Lisa Menninger in future compensatory damages for the time period after today's date?

\$\_\_\_\_\_ (amount expressed in numbers)

\_\_\_\_\_ (amount expressed in words)

*Proceed to Part C.*

**Part C**

5. Do you find that punitive damages are appropriate?

YES \_\_\_\_\_ NO \_\_\_\_\_

*If your answer to Question 5 is Yes, proceed to Question 6. If your answer is No, proceed to Part D.*

6. What amount of punitive damages do you award Plaintiff Lisa Menninger?

\$\_\_\_\_\_ (amount expressed in numbers)

\_\_\_\_\_ (amount expressed in words)

*Proceed to Part D.*

**Part D**

*Please have the foreperson sign and date this verdict form, and then inform the Court security officer that you have reached a verdict.*

I hereby certify the foregoing answers are the unanimous answers of the jury.

\_\_\_\_\_  
Jury Foreperson

\_\_\_\_\_  
Dated: \_\_\_\_\_

Respectfully submitted,  
Plaintiff Lisa Menninger,  
By her attorneys,

/s/ Hampton M. Watson

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Date: March 10, 2023

**CERTIFICATE OF SERVICE**

I, Hampton M. Watson, certify that on March 10, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Defendant by electronically serving its counsel of record.

/s/ Hampton M. Watson

Hampton M. Watson